

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* AUGUST 4, 2023 *
BROOKLYN OFFICE

JPL:JBD
F. #2023R00459

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

DOUGLAS NOEL,

Defendant.

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I N D I C T M E N T

Cr. No. 23-CR-320
(T. 18, U.S.C., §§ 2251(e), 2253(a),
2253(b) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

Judge Pamela K. Chen
Magistrate Judge Ramon E. Reyes, Jr

THE GRAND JURY CHARGES:

ATTEMPTED SEXUAL EXPLOITATION OF A CHILD

1. On or about and between May 4, 2023 and June 28, 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DOUGLAS NOEL did knowingly and intentionally attempt to employ, use, persuade, induce, entice and coerce a minor, to wit: an individual known to NOEL as "Maria" and whom NOEL believed to be a 15-year-old girl, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct and for the purpose of transmitting one or more live visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using one or more means and facilities of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, and which visual depictions would be produced and transmitted using materials that

had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

(Title 18, United States Code, Sections 2251(e) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following assets, all seized by law enforcement from the defendant on or about and between June 28, 2023 and July 10, 2023:

(a) one black Android cellular telephone with International Mobile Equipment Identity (“IMEI”) number 354090791398384;

(b) one gray Apple Macbook laptop computer;

(c) one blue Samsung portable hard drive, T7 SSD;

(d) one black Samsung portable hard drive, T7 SSD;

(e) one 128 gigabyte Sandisk SD media card;

(f) one 128 gigabyte Prograde SD media card; and

(g) one black Apple iPhone cellular telephone with International IMEI number 350320348076355.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2023R00312
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

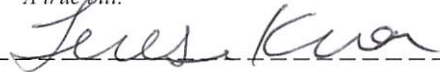
DOUGLAS NOEL,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2251(e), 2253(a), 2253(b) and 3551 et seq.; T. 21,
U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Joshua B. Dugan, Assistant U.S. Attorney (718) 254-6144